



# FY23 GRANTS POLICIES & PROCEDURES TRAINING

JULY 19, 2022

# WELCOME AND INTRODUCTIONS

## Housekeeping

## Facilitators

- Kristin Nguyen, Director of Grants Administration
- Madeleine Gorman, Director of Monitoring & Compliance
- MOVA Grants Administration Staff
  - Ashlee Renich-Malek, Grants Administration Specialist
  - Kurtis Short, Program Coordinator
- Liam Lowney- Executive Director

UPDATE

**VOCA  
BRIDGE  
\$20M**

included in the

**FY23  
BUDGET**

Massachusetts Office For Victim Assistance  
**MOVA**  
Victim & Witness Assistance Board

# OBJECTIVES

## Meeting objectives:

- 1) Help you develop a clear understanding of the changes to the VOCA/SAFEPLAN policies and procedures in FY2023
- 2) Answer your questions about the policies and procedures

## Approach to the content:

- 1) Review the key changes and discuss your questions
- 2) Discuss questions you have about other sections of the policies and procedures
- 3) Discuss allowable/unallowable expenses
- 4) Answer any additional questions you have about compliance, monitoring, and policies/procedures

# AGENDA

- Key Changes to FY23 VOCA and SAFEPLAN policies and procedures
  - Civil Rights Compliance (p.13)
  - Limited English Proficiency (LEP) Access Requirements (p.14)
  - Risk assessment (p.19) and updated sub-recipient monitoring requirements (p.19-21)
  - Match Waivers (p.22)
  - Budget Amendments (p.33)
  - Cash on hand (p.25)
- eGrants
- Common monitoring findings
- Brief activity (polls)
- Questions & Answers



# CIVIL RIGHTS COMPLIANCE

# CIVIL RIGHTS TRAINING REQUIREMENT

- **Intent:** Ensure that subrecipients understand the overall civil rights compliance requirements from the Office of Justice Programs' Office for Civil Rights
- **Practice:**
  - Complete the training once per grant award (<https://www.ojp.gov/program/civil-rights/online-training>)
  - Training must be completed by a minimum of one key agency representative
  - Documentation of training completion must be maintained

# EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

- **Intent:** Ensure equal employment opportunities are available to all groups of people
- **Practice:**
  - Complete and submit to the Office for Civil Rights the necessary documents to be in compliance with Equal Employment Opportunity Program (EEO) requirements
  - Dependent on the agency type, size, and award amount requirements may include:
    - Completion of an EEO Certification Form
    - Completion of an EEO Utilization Report
    - Completion of an EEO plan
  - EEO Reporting Tool - [www.ojp.gov/program/civil-rights/equal-employment-opportunity-plans](http://www.ojp.gov/program/civil-rights/equal-employment-opportunity-plans)



# NON-DISCRIMINATION – EMPLOYMENT PRACTICES & SERVICE PROVISION

- **Intent:** Make sure employees and program participants are not discriminated against in your hiring or service provision practice based on race, color, national origin, religion, sex, disability, or sexual orientation and gender identity.
- **Practice:**
  - Develop written practices to mitigate discrimination in the provision of services to participants and/or prospective participants, including:
    - How participants or prospective participants are informed of non-discrimination practices or policies
    - How to file a grievance/complaint alleging discrimination
  - Develop written practices to mitigate discrimination in hiring practices, including:
    - How employees or prospective employees are informed of non-discrimination practices or policies
    - How to file a grievance/complaint alleging

# SUBMISSION OF FINDINGS OF DISCRIMINATION

- **Intent:** Track findings of discrimination and ensure that steps have been taken to address findings
- **Practice:**
  - Any adverse finding of discrimination based on race, color, national origin, sex, or religion from a federal or state court or federal or state administrative agency must be reported to MOVA
    - Submit to your MOVA grants manager or [MOVAgreements@mass.gov](mailto:MOVAgreements@mass.gov) in a timely fashion
    - MOVA is required to report any adverse findings to the Office for Civil Rights

# DOCUMENTED LANGUAGE ACCESS PLANS

- **Intent:** Develop procedures and implementation plans to ensure your services are accessible, appropriate, and culturally responsive to people with limited English proficiency
- **Practice:**
  - Take reasonable steps to provide meaningful access to your programs and activities for persons with limited English proficiency
    - Oral interpretation and written documentation of vital documents
  - These practices and procedures must be documented in written policy and/or procedure
  - Additional resources: <https://www.ojp.gov/program/civil-rights/limited-english-proficient-lep>



# MONITORING & RISK ASSESSMENT

# RISK ASSESSMENT PROCESS

- **Intent:** Match the level of monitoring to the needs of each award
- **Practice:** The risk assessment includes an evaluation of programmatic, administrative, and fiscal compliance with award terms and conditions
- MOVA's subaward risk assessment is broadly based on the following categories:
  - Organizational questionnaire
  - Total award amount
  - Timeliness and accuracy of reports
  - Adherence to budget
  - History of award administration
  - Performance during site visits and desk reviews
  - Overall performance indicators

# MONITORING LEVELS

- **Intent:** Match the level of monitoring to the risks/needs of each award
- **Practice:** The risk assessment includes an evaluation of programmatic and fiscal compliance with award terms and conditions and is used to determine annual monitoring levels
  - Monitoring Levels: Level 1, Level 2, and Level 3
  - Monitoring activities are based on assigned monitoring levels and these activities have changed for the FY23 award cycle
  - Monitoring levels have been assigned for FY23

	Level I	Level II	Level III
Expenditure reports	No backup documentation with expenditure reports, unless requested by MOVA	No backup documentation with expenditure reports, unless requested by MOVA	Full backup documentation for expenditure reports for the first quarter, at a minimum. Based on expenditure report performance backup may be reduced after the first quarter.
Desk review	One per fiscal year of at least one month of reimbursements	One per fiscal year of at least two months of reimbursements	Desk reviews will begin if/when an agency begins submitting expenditure reports with no backup documentation
On site visit	One complete programmatic and financial site visit every two years	One complete programmatic and financial site visit every two years	One complete programmatic and financial site visit every two years. Ongoing technical assistance as needed.

\*Technical assistance available as needed to all sub-recipients

# MATCH WAIVERS



# MATCH WAIVERS

- **Intent:** To support programs during the COVID-19 pandemic, match requirements have been automatically waived for FY23.
- **Practice:**
  - Following the passage of the VOCA Fix to Sustain the Crime Victims Fund Act of 2021, signed by Congress on July 22, 2021, MOVA issued automatic match waivers for all VOCA subrecipient programs.
  - No action is required by programs to accept the match waiver.
  - Programs may choose to opt out of accepting the automatic match waiver.

# MATCH WAIVERS

- MOVA will continue to automatically waive match until further notice. Per the VOCA fix statute, match will be automatically waived until the national emergency is declared over, and for 1 year following that date.
- *“Beginning on the date a national emergency is declared under the National Emergencies Act (50 U.S.C. 1601 et seq.) with respect to a pandemic and ending on the date that is one year after the date of the end of such national emergency, each chief executive shall issue waivers for any matching requirement, in its entirety, for all eligible crime victim assistance programs contracted to provide services at that time.”*

Source:

VOCA Fix to Sustain the Crime Victims Fund Act of 2021

MOVA's Match Waiver Policy



# BUDGET AMENDMENTS

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- **Intent:** To reallocate funds as program needs and/or staffing changes.
- **Practice:** Sub-recipients may request a budget amendment to reallocate funds at any point during the fiscal year. The original award amount will not be increased by this procedure.
- **All** budget amendment requests must be submitted via eGrants and will require MOVA approval. Requests must include:
  - Budget amendment submitted via eGrants;
  - A narrative describing the reason for the amendment request and the changes proposed;
  - A programmatic change form, with required staff information, if changes impacting personnel are proposed.



CASH ON HAND

# CASH ON HAND

- **Intent:** Comply with federal cash on hand requirements. VOCA is a reimbursement grant; therefore, subrecipients should not have any balance of federal cash on hand.
- **Practice:**
  - Organizations should request funds on a monthly basis based upon immediate disbursement/reimbursement requirements.
  - Funds will not be paid in a lump sum, but rather disbursed over time as project costs are incurred.
  - Reimbursement requests should be timed to ensure that Federal cash on hand is the minimum needed for disbursements/reimbursements to be made immediately or within 10 days.
  - If not spent or disbursed within 10 days of receipt, MOVA reserves the right to request funds to be returned.



EGRANTS

# EGRANTS TIMELINE

- **Intent:** “One stop shop” for all grant requirements; shifting to paperless processes
- **Practice:** As of July 1, 2022, all aspects of MOVA grants administration will be via eGrants. This includes applications for funding, contracting, expenditure reports, monitoring events, budget amendments, outcome measurement reporting, etc.

Resources can be found on MOVA’s website, including:

- Tutorials
- User role guidance
- User Manual
- FAQ’s



# EGRANTS “PRACTICE TO PERFECT” SESSIONS

MOVA will be hosting a six-month series of open office hour sessions. Attendance is optional but encouraged to learn more about the new system. Registration is required. You must register for each session you will attend. MOVA encourages you to submit questions ahead of time on the registration form.

- Wednesday, July 27th at 1-2pm
- Tuesday, August 9th at 11am-12pm
- Monday, August 22nd at 3-4pm
- Wednesday, September 14th 1-2pm
- Wednesday, October 12th at 1-2pm
- Wednesday, November 9th at 1-2pm
- Wednesday, December 7th at 1-2pm



# COMMON MONITORING FINDINGS

# COMMON MONITORING FINDINGS: OFFICE FOR CIVIL RIGHTS

1. EEOP compliance
2. Written/documented language access plans
3. Non-discrimination in the provision of services
  - documentation of policies/procedures on how participants/beneficiaries are informed of practices and how to file a grievance alleging discrimination
4. Non-discrimination in employment practices
  - documentation of policies/procedures on how employees/prospective employees are informed of practices and how to file a grievance alleging discrimination

# COMMON MONITORING FINDINGS: REPORTING REQUIREMENTS

1. Timely and accurate submission of expenditure reports
2. Back-up documentation
  - Retention of back-up documentation for all reimbursement requests must be kept, regardless of an agency's requirements for submission of back-up documentation with expenditure reports
3. Timely and accurate submission of performance reports

# COMMON MONITORING FINDINGS: FINANCIAL MANAGEMENT

## 1. Accurate accounting records

- Receipt, obligation, and expenditure of grant funds must be tracked accurately within a financial accounting system

## 2. Separation of funds

- VOCA and SAFEPLAN funds must be able to be separated from other agency revenue/expenses and, if applicable, award funds must be separated by program/award

## 3. Time Reporting/Payroll Records

- All time spent working towards a VOCA or SAFEPLAN awards must be documented accurately in payroll records and/or timesheets. Payroll records must identify funded hours or be easily identified by cost center or code.

# COMMON MONITORING FINDINGS: PROGRAMMATIC/GENERAL

- Breach of Personally Identifiable Information (PII) Policy
  - Written procedures must be in place to respond to an actual or imminent breach of PII. This must include the requirement to report any actual or imminent breach to MOVA immediately.
- Crime Victim Compensation Benefits
  - Staff must be trained in victim compensation and assist victims/survivors in seeking and applying for benefits. Programs must maintain a supply of victim compensation brochures and establish policies/procedures to identify who may be eligible for victim compensation
- VOCA Special Conditions
  - Special conditions can be found on MOVA's website (<https://www.mass.gov/service-details/for-currently-funded-agencies>)



# POLL GAME: POLICY & ELIGIBLE COSTS

## POLL QUESTION I

- When working with a program participant, I can offer to pay for the fees associated with replacing a lost driver's license in the aftermath of a victimization.



## POLL QUESTION | ANSWER

- Allowable:
  - “Fees paid to local, state, and/or federal agencies” was removed from the unallowable cost list for FY23

## POLL QUESTION 2

- I was notified my program was assigned a level I monitoring level for FY23. That means I no longer need to collect and retain supporting documentation for expenses included within my expenditure reports.

## POLL QUESTION 2 ANSWER

- Incorrect
  - Level 1 and Level 2 monitoring levels do not need to submit full backup documentation with their monthly expenditure reports unless requested by MOVA, however, it is the responsibility of the sub-recipient agency to retain backup documentation to support all costs requested for reimbursement against a contract or ISA, including match expenses if applicable, and to be able to provide such documentation to MOVA upon request. MOVA reserves the right to request the return of any funds without adequate associated backup documentation.

## POLL QUESTION 3

- I can e-mail my monthly expenditure reports to my grant manager during the FY23 contract cycle

## POLL QUESTION 3 ANSWER

- Incorrect
  - eGrants is required for all grants administration functions as of the start of the FY23 contract cycle. Please visit MOVA's website and attend the open office hours for further trainings and discussion.

## POLL QUESTION 4

- I can use VOCA funds to advertise a job opening at my agency

## POLL QUESTION 4 ANSWER

- Allowable
  - Costs of advertising to recruit VOCA-funded personnel (e.g. newspaper notices, online job board postings, etc.) are allowable and reimbursable

# UPDATED ALLOWABLE/UNALLOWABLE COST RESOURCE

- This guide is updated as we receive questions from the field and provide answers. This guide is not exhaustive and does not include all allowable and unallowable costs examples. Subrecipients should send any allowability questions to their MOVA grant manager.
- This tool can be found on MOVA's website:
  - <https://www.mass.gov/doc/voca-allowable-unallowable-cost-examples/download>





# QUESTIONS AND ANSWERS

## QUESTIONS & ANSWERS

**Q:** Where can I find the most current copies of MOVA's policies and procedures manuals?

**A:** Policies and procedures manuals can be found on MOVA's website, under the page 'For Currently Funded Agencies' and under the section titled 'Policies & Procedures.'

- <https://www.mass.gov/info-details/policies-and-procedures>
- A newly updated version of the SAFEPLAN Policies & Procedures Manual will be added shortly

# MOVA CURRENTLY FUNDED PROGRAMS WEBPAGE

## For currently funded agencies

Important updates for currently funded agencies can be found in the tabs below.

To be kept informed about updates from MOVA, please join our email distribution list by sending your name and email address to [mov@mass.gov](mailto:mov@mass.gov). We never share contact information. In addition to MOVA's general listserv, there are three email lists for MOVA's funded programs, broken down by funding stream (VOCA, SAFEPLAN, and DDTF). If you are a current subrecipient and should be added to any of these lists, please let us know.

## What would you like to do?

### Top tasks

[Outcome Measurement Tool \(OMT\) →](#)

[eGrants →](#)

[Federal Civil Rights and Non-Discrimination Compliance Resources →](#)

### All other tasks

[Forms and References →](#)

[Policies and Procedures →](#)

## QUESTIONS & ANSWERS

**Q:** Do you have sample policies and procedures for the two new federal requirements?

**A:** As these special conditions are new to MOVA as well we don't yet have any sample policies or procedures.

- Determination of Suitability to Interact with Participating Minors - Agencies will need to have some type of written policy or procedure in place that documents the agency's process to determine suitability to interact with participating minors, as outlined in the special condition. The written policy or procedure should include mention of the creation of written determinations of any applicable individual's suitability to interact with minors.
- Employment Eligibility Verification for Hiring Under the Award - Agencies will need to have a written policy and or procedure that documents how employment eligibility is verified, as outlined in the special condition. This written policy or procedure should include mention that all employment eligibility verifications records are maintained.

## QUESTIONS & ANSWERS

**Q:** How can I change my monitoring level?

**A:** Monitoring levels will be assessed on a yearly basis, based on the factors reviewed earlier in this presentation and within the policies and procedures manuals. A few specific areas to pay close attention to are timely and accurate submission of expenditure reports, timely and accurate submission of performance reports, responsiveness to communications and requests from MOVA, performance during desk reviews and site visits, and overall compliance with requirements outlined in the policies and procedures manual.



# OPEN QUESTIONS AND ANSWERS



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## VISIT OUR WEBSITES

[WWW.MASS.GOV/MOVA](http://WWW.MASS.GOV/MOVA)

[WWW.MASS.GOV/ASKMOVA](http://WWW.MASS.GOV/ASKMOVA)

[WWW.MASS.GOV/GARDENOFPEACE](http://WWW.MASS.GOV/GARDENOFPEACE)

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